

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PENNSYLVANIA GENERAL ENERGY )  
COMPANY, LLC, )  
Plaintiff ) Civil Action No. 14-cv-209 ERIE  
v. ) Magistrate Judge Susan Paradise Baxter  
GRANT TOWNSHIP, )  
Defendant. )

**PROPOSED ORDER**

THIS \_\_\_\_ day of \_\_\_\_\_, 2019, the Court **GRANTS** the Motion for Approval of Alternative Security and Stay of Execution of Sanctions Order and enters the following **ORDER**:

1. Enforcement of the Order of Sanctions of January 5, 2018 (Doc. 290) is stayed pending full resolution of all appeals pertaining to the Order.
2. As a condition of the stay:
  - a. The sum of \$52,000.00 shall be escrowed by or on behalf of Thomas A. Linzey and Elizabeth Dunne (collectively “Sanctioned Lawyers”) in an interest-bearing account with a financial institution.
  - b. The escrowed sum shall be held by the financial institution until further Order of Court.
  - c. The Sanctioned Lawyers shall pay all administrative costs associated with setting up and maintaining the funds in escrow such that the total sum of \$52,000.00 is not reduced in any way during the appeal.
  - d. The Sanctioned Lawyers will provide PGE with proof of such escrow account and the amount held in said account within 14 calendar days of this Order.

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J.